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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91212809
Party	Defendant Fiat Group Automobiles S.p.A.
Correspondence Address	JOHN A CLIFFORD MERCHANT & GOULD PC PO BOX 2910 MINNEAPOLIS, MN 55402-0910 UNITED STATES
Submission	Answer
Filer's Name	John A. Clifford
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Signature	/John A. Clifford/
Date	11/12/2013
Attachments	2013 11 12 Answer to Notice of Opposition.PDF(90454 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Sofia Sizzi,

Opposer,

v.

Fiat Group Automobiles S.p.A.,

Applicant.

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Opposition No. 91212809

Serial No.: 85/678,731

Mark: **GIULIETTA**

ANSWER TO NOTICE OF OPPOSITION

To The Assistant Commissioner for
Trademarks
ATTN: BOX TTAB
2900 Crystal Drive
Arlington, VA 22202-3513

Dear Sir:

COMES NOW, Fiat Group Automobiles S.p.A. ("Applicant") to Answer the Notice of Opposition filed by Sofia Sizzi ("Opposer"). All allegations not specifically admitted herein are denied. Specific responses to the numbered allegations within the Notice of Opposition follow.

1. Admitted.
2. Admitted that Opposer is the listed owner of Registration No. 4,053,266 as of the date it issued.
3. Applicant admits that the subject registration issued on November 8, 2011. The remaining allegations are denied.
4. Applicant is without knowledge of the substance of this allegation, and therefore denies the same.

5. It is admitted that the filing date of Applicant's application is after the registration of Opposer. It is denied that Opposer has priority of use over Applicant.
6. Denied.
7. Denied.
8. Denied.

AFFIRMATIVE DEFENSES

1. The Notice of Opposition fails to state a claim upon which relief may be granted.
2. Applicant has priority of use of the GIULIETTA mark and has continuously used the mark for a variety of goods and services since long prior to any use of the mark by Opposer.
3. Opposer's trademark is not confusingly similar to the mark of Applicant once the relative goods, channels of trade, sophistication of the purchasers, and the affinity consumers have for Applicant's GIULIETTA trademark is considered.

WHEREFORE, Applicant requests that the Notice of Opposition be dismissed, with prejudice with Opposer taking nothing, and that Application Serial No. 85/678,731 proceed to receive a Notice of Allowance.

Please direct all correspondence to the attention of:

John A. Clifford
Merchant & Gould P.C.
P.O. Box 2910
Minneapolis, MN 55402-0910
Tel: 612-336-4616 Fax: 612-332-9081

Opposer hereby appoints: John A. Clifford; Danielle I. Mattessich; Heather Kliebenstein, Brian H. Batzli; Gregory C. Golla; Scott W. Johnston; Andrew S. Ehard; Christopher J. Schulte;

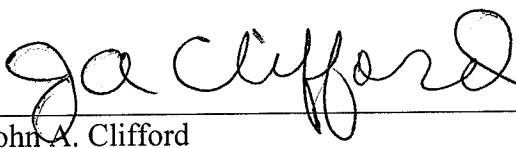
and Brent Routman as its attorneys with the full power to represent the Opposer in connection with this proceeding.

Respectfully submitted,

Fiat Group Automobiles S.p.A.,

By its attorneys,

Date: Nov 12, 2013




John A. Clifford
MERCHANT & GOULD P.C.
P.O. Box 2910
Minneapolis, MN 55402-0910
Tel. 612.336.4616
Fax 612.332.9081

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **ANSWER TO NOTICE OF OPPOSITION** was served, via first-class mail, postage prepaid this 12th day of November 2013.

Felix Reznick
REZNICK LAW PLLC
445 Park Avenue, 17th Floor
New York, NY 10022



John A. Clifford